Exhibit 1

Begin forwarded message:

From: "Vanaskie, Thomas I." <thomas.vanaskie@stevenslee.com>
Subject: RE: Valsartan MDL, No. 1:19-md-02875-RMB-SAK -- Update on ZHP Discovery
Date: April 9, 2025 at 2:09:10 PM EDT
To: "Hansen, Milli Kanani" <Milli.Hansen@skadden.com>
Cc: "Bernardo, Richard T" <Richard.Bernardo@skadden.com>, Adam Slater <ASlater@mazieslater.com>

Dear Counsel,

Please provide a status update on the discovery matters by April 14, 2025.

Sincerely,

Thomas I. Vanaskie
Special Master

Hon. Thomas I. Vanaskie (Ret.)
Stevens & Lee
1500 Market Street, East Tower, Suite 1800
Philadelphia, PA 19102
T: 215-568-7560
F: 610-371-7360
425 Biden Street, Suite 300
Scranton, PA
F: 610-371-7360
thomas.vanaskie@stevenslee.com

From: Hansen, Milli Kanani <Milli.Hansen@skadden.com>
Sent: Friday, April 4, 2025 6:13 PM
To: Vanaskie, Thomas I. <thomas.vanaskie@stevenslee.com>
Cc: Bernardo, Richard T <Richard.Bernardo@skadden.com>; Adam Slater <ASlater@mazieslater.com>
Subject: Valsartan MDL, No. 1:19-md-02875-RMB-SAK -- Update on ZHP Discovery

Dear Judge Vanaskie –

I am writing to update you as to the status of various discovery discussed during the status conference on March 25, 2025. Mr. Slater is copied on this email.

First, ZHP has identified for plaintiffs the specific retention policies that apply to certificates of analysis and have pointed them to those policies by Bates number. I have attached the produced versions of those policies to this email, as well as a certified translation of one of those policies. It appears that the certified translation of the other policy we received is missing pages and we have reached out to the translator to correct this issue. We will send you that translation when we receive the complete document.

Second, we have confirmed that the Chinese industry standards for DMF and TEA that we previously provided to plaintiffs were found online and are not maintained in ZHP's files. As Mr. Bernardo explained at the status conference, those standards are akin to regulatory standards, and they would apply to raw materials sold in China by any supplier. Thus, for example, the industry standard for DMF that we provided to plaintiffs sets forth the basic quality requirements for any DMF sold in China for use in API. ZHP itself does not manufacture DMF (but rather purchases it from suppliers) so it is not surprising that the DMF industry standard is not maintained in its files. ZHP also confirmed for plaintiffs that it does not believe that there is a published standard for TEA HCl. ZHP has pointed plaintiffs to information in the drug master file related to the control of the raw materials used for valsartan, including certain testing elat. That information for TEA HCl is contained in Section 3.2.S.2.3 of the Valsartan, USP (Process II) Drug Master File.

Third, ZHP is in the process of collecting the quality inspection records for DMF, TEA, and TEA HCl. Some of those records have computer-generated chromatograms and other raw testing data that we will also produce. ZHP respectfully requests an additional week to produce these records (from April 8 to April 15) – the process to copy these records is taking longer than expected given the inclusion of the chromatograms as well as the overlap with a Chinese holiday.

Please let us know if you have any questions.

Milli

Milli Kanani Hansen
Skadden, Arps, Slate, Meagher & Flom LLP
1440 New York Avenue, N.W. | Washington | D.C. | 20005-2111
T: +1.202.371.7128 | M: +1.214.235.8938
milli.hansen@skadden.com

Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

==========